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**WOODBURN AND WEDGE**

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*Attorneys for Plaintiff*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

GST INTERNATIONAL, INC., a Nevada  
corporation,

Plaintiff,

v.

TOM MARTIN, an individual; BRANDON  
RAPOLLA, an individual; KNIGHTS  
CONSULTING & TECHNICAL SERVICES,  
INC., a Nevada corporation; LEANNE  
MARTIN, an individual; HARGETT  
MATERIALS, INC., a Tennessee corporation;  
JOHN HARGETT, an individual; and DOES 1  
through 50, inclusive,

Defendants.

Case No.: 3:21-cv-00285

**STIPULATION TO EXTEND TIME TO**  
**FILE OPPOSITION TO**  
**DEFENDANTS' MOTION TO**  
**DISMISS FIRST AMENDED**  
**COMPLAINT (ECF NO. 25)**  
**(SECOND REQUEST)**

Plaintiff GST INTERNATIONAL, INC., a Nevada corporation ("GST") and  
Defendants HARGETT MATERIALS, INC., JON HARGETT, TOM MARTIN, LEEANNE  
MARTIN, and KNIGHTS CONSULTING & TECHNICAL SERVICES, INC. ("Defendants"),  
by and through their respective counsel of record, hereby stipulate and agree as follows:

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1           1.       The parties agree to extend the October 25, 2021 due date of the Opposition to  
 2 Defendants' Motion to Dismiss First Amended Complaint (ECF No. 25), to Thursday,  
 3 November 4, 2021. The parties previously stipulated to extend the deadline from October 19,  
 4 2021, to October 25, 2021 (ECF No. 29). The Court approved this extension by minute order  
 5 entered on October 19, 2021 (ECF No. 30). This additional extension is made in good faith and  
 6 not for dilatory purposes. The parties are discussing possible resolution of Defendants' motion  
 7 and/or possible narrowing of the issues raised in the motion and require the additional time to  
 8 facilitate discussion among counsel and their respective clients.

9           The undersigned do hereby affirm that the preceding document does not contain any  
 10 personal information.

11 DATED this 25<sup>th</sup> day of October, 2021.

DATED this 25<sup>th</sup> day of October, 2021.

12           WOODBURN AND WEDGE

FENNEMORE CRAIG, P.C.

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 14  
 15 By: /s/ Dane Anderson  
 16 Dane W. Anderson, Esq.  
 Nevada Bar No. 6883


By: /s/ Shannon Pierce  
 Shannon S. Pierce, Esq.  
 Nevada Bar No. 12471

17 *Attorneys for Plaintiff GST*  
 18 *International, Inc.*

*Attorneys for Defendants Hargett*  
*Materials, Inc., Jon Hargett, Tom*  
*Martin, LeeAnne Martin, and*  
*Knights Consulting and Technical*  
*Services, Inc.*

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 21 IT IS SO ORDERED.

22 Dated: 10/26/2021

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 U.S. District Judge

**CERTIFICATE OF SERVICE**

I certify that I am an employee of Woodburn and Wedge, and that on this date, pursuant to FRCP 5(b), I am serving a true and correct copy of the STIPULATION TO EXTEND TIME TO FILE REPLY TO DEFENDANTS' MOTION TO DISMISS FIRST AMENDED COMPLAINT (SECOND REQUEST) on the parties set forth below by electronic service effected by CM/ECF to:

Robert Golden, Esq.  
Nolte Lackebach Siegel  
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DATED this 25<sup>th</sup> day of October, 2021.

/s/ Caitlin Pagni  
An Employee of Woodburn and Wedge